REMARKS/ARGUMENTS

Status of Claims

Claims 1-23 are currently pending in this application. Claims 1, 6-7 and 21 have been amended.

Claim objections and 112 rejections

The claims have been amended as suggested by the Examiner, thereby overcoming the objections and 112 rejections.

35 USC §103 Rejections

Claims 1-10 and 17-23 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Pat. No. 6,714,979 to *Brandt* in view of EPO Pat. No. 1,016,989 to *Yee*. Applicants respectfully submit that the combination of *Brandt* and *Yee* does not establish a *prima facie* case of obviousness as to claims 1-10 and 17-23. According to MPEP 2142, three basic criteria must be met to establish a *prima facie* case of obviousness:

> First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed

> combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

The Examiner has failed to establish a *prima facie* case of obviousness as the combination of *Brandt* and *Yee* does not teach or suggest all of the claim limitations. Specifically, such a combination does not teach or suggest steps (c)-(f) as recited in independent claim 1 or steps (c)-(e) of independent claim 23.

In the context of a system for allowing customers to access their billing data via a web-based application, *Brandt* discloses a subsystem for extracting the billing data from various sources, transforming the billing data, and loading the billing data into target datamarts. However, *Brandt* does not provide any details or disclosure on how the data is packaged and routed between the source and the target. In other words, *Brandt* does not teach or suggest steps (c)-(f) as recited in independent claim 1 or steps (c)-(e) as recited in independent claim 23.

Applicants note with appreciation that the Examiner acknowledges that *Brandt* does not teach or suggest wrapping the transformed information into a message envelope having a standard format as recited in step (c) of claims 21 and 23 or unwrapping the message envelope to reveal the information received as recited in step (e) of claims 21 and 23. Applicants respectfully submit that *Brandt* likewise fails to teach routing the message envelope to at least one information target. In simple terms of logic, *Brandt* cannot teach the routing of a message envelope when the Examiner acknowledges that *Brandt* does not teach the formation of such an envelope via wrapping. More specifically, the Examiner cites col. 14, lines 57-67 as disclosing routing:

> ...comprising: a) an Extract process 500 for creating selection tables including all current nMCI Interact customers, compressing

> files for transmission to service centers, and extracting (Priced Reporting enabled) records from divisions or runstreams; and, b) a Harvesting component 600 including processes for creating dimension tables based on data within selected BDRs, applying business rules to the data, transforming the data into centralized fact table, creating load files for data marts, and compressing files for transmission; 5) Operation Data Store (ODS) component 450, including a process 465 for loading transformed billing detail records...

From this cited text, presumably the Examiner is relying on the twice-repeated phrase "compressing files for transmission". Facially, such a general reference to "transmission" cannot reasonable be interpreted as disclosing Applicants' routing function recited in step (d). Furthermore, upon careful reading and placed in the overall context of the *Brandt* reference, which is directed to a system to provide billing reports to via the web, it is clear that the reference to transmission is directed to transmitting data back to the customer via web based transmission, and such occurs downstream of the distributed extract, transform, and load (ETL) functionality and subsystem that is the focus of Applicants' disclosure.

Again, *Brandt* is completely silent as to what, if any, steps are performed between the transforming (i.e., harvesting 26) and loading (i.e., datamart load 465). In contrast, Applicants' disclosure is focused on this very subject, namely how to efficiently route extracted information prior to loading. Applicants recite a specific sequence of steps between the extracting and loading functions, which *Brandt* alone or in combination with *Yee* does not disclose. In fact, Applicants' claimed method for delivering information is complimentary with, rather than

preempted by, *Brandt*. For example, upon completion of harvesting 26 of data, *Brandt* could employ Applicants' recited steps of wrapping, routing, unwrapping, and mapping prior to the datamart load 116. Employing Applicants' disclosure in combination with *Brandt* would allow the decision support services function 475 to more efficiently extract and load information from a variety of data sources for transmission to an end user (e.g., customer).

The secondary reference, *Yee*, does not make up for the lack of disclosure in *Brandt*. The Examiner relies upon *Yee* as disclosing wrapping step (c) and unwrapping step (e). However, the paragraphs of *Yee* relied upon by the Examiner are taken in isolation and in no way relate to or disclose the specific sequence of steps recited by Applicants. In other words, there is no teaching or suggestion in *Brandt* or *Yee* to make Applicants' claimed combination or a reasonable expectation of success to do so. The Examiner states that it would have been obvious to "combine the teaching of *Yee* and *Brandt* because the teaching of *Yee* would have improved the system of *Brandt* by providing a means for sending and propagating messages across varying platforms." Applicants respectfully submit that no such teaching is present in either *Brandt* or *Yee*, as the primary reference *Brandt* is completely silent as to any additional steps being carried out between harvesting 26 and datamart load 116. Furthermore, such motivation as cited by the Examiner is expressly set forth in Applicants' disclosure, for example in the Field of Invention:

> The invention is a distributed extract, transfer, and load (ETL) computer method (hereinafter referred to as Distributed ETL) for linking together multiple information domains residing across an enterprise-wide computing environment in order to share corporate information, while reducing the time required to deliver that information. The invention overcomes the many-to-many

> relationships that exist between information sources and targets residing within each domain by implementing a central router to deliver information to and from these domains.

Applicants appreciate that the Examiner understands the complimentary purpose and relationship of Applicants' Distributed ETL architecture to the primary reference *Brandt*, but the Examiner may not use such understanding as a basis for combining *Brandt* and *Yee* as to do so constitutes the impermissible use of hindsight. Furthermore, it appears that the Examiner has impermissibly ignored the following language from claim 1 (as amended) reciting portions of the distributed architecture (emphasis added):

> Wherein the extracting, transforming, and wrapping steps (a)-(c), respectively, are isolated from the routing step (d) such that the extracting, transforming, and wrapping steps may be executed simultaneously for a plurality of information sources **distributed across the computing environment** to produce a plurality of information sources **distributed across the computing environment** to produce a plurality of message envelopes and wherein the routing, unwrapping, mapping, transforming, and loading steps (d)-(h), respectively, are repeated for the plurality of message envelopes.

Neither *Brandt* nor *Yee*, alone or in combination, teach or suggest such a distributed ETL architecture as recited in the pending claims.

In summary, the Examiner has failed to establish a *prima facie* case of obviousness against claims 1-10 and 17-23 as there is no teaching or suggestion to combine *Brandt* and *Yee* to

achieve the method recited in the pending claims nor does the combination of *Brandt* and *Yee* (assuming such is proper) disclose each and every element as recited in the pending claims.

Claims 11-16 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Pat. No. 6,714,979 to *Brandt* in view of EPO Pat. No. 1,016,989 to *Yee* and further in view of U.S. Pat. No. 6,704,768 to *Zombek*. Applicants respectfully submit that the combination of *Brandt*, *Yee*, and *Zombek* does not establish a *prima facie* case of obviousness as to claims 11-16. Assuming for sake of argument that the combination of *Brandt*, *Yee*, and *Zombek* is proper (and without conceding such), the Examiner has nonetheless failed to establish a *prima facie* case of obviousness as such a combination does not teach or suggest all of the claim limitations. Claims 11-16 depend from and incorporate the limitations of independent claim 1. As discussed previously, *Brandt* and *Yee* do not disclose each and every element of claim 1, and more specifically does not disclose several recited elements related to the distributed ETL architecture. *Zombek* is not cited by the Examiner for the purpose of providing these missing elements, and in any event does not do so even if relied upon for such. Thus, Applicants respectfully submit that claims 11-16 are patentable over the art of record.

CONCLUSION

Applicants respectfully submit that the present application as amended is in condition for allowance. If the Examiner has any questions or comments or otherwise feels it would be helpful in expediting the application, he is encouraged to telephone the undersigned at (972) 731-2288.

The Commissioner is hereby authorized to charge payment of any further fees associated with any of the foregoing papers submitted herewith, or to credit any overpayment thereof, to Deposit Account No. 21-0765, Sprint.

Respectfully submitted,

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